

KELLER BENVENUTTI KIM LLP  
Tobias S. Keller (#151445)  
(tkeller@kbbkllp.com)  
Peter J. Benvenutti (#60566)  
(pbenvenutti@kbbkllp.com)  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBB MCWILLIAMS  
IN SUPPORT OF REORGANIZED  
DEBTORS' THIRD THROUGH FIFTH  
OMNIBUS OBJECTIONS TO CLAIMS  
(DUPLICATE CLAIMS)**

**Response Deadline:  
September 8, 2020, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: September 22, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Robb C. McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby  
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,  
3 information, and belief:

4 1. I am a Managing Director at the firm of AlixPartners, LLP (“**AlixPartners**”), which is  
5 an affiliate of both AlixPartners, LLC and AP Services, LLC, (“**APS**”), which provides interim  
6 management services to Pacific Gas and Electric Corporation and Pacific Gas and Electric Company, as  
7 debtors and reorganized debtors (collectively, the “**Debtors**,” or, as reorganized pursuant to the Plan, the  
8 “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”). I submit  
9 this Declaration in support of the *Reorganized Debtors’ Third Omnibus Objection to Claims (Duplicate*  
10 *Claims)*, the *Reorganized Debtors’ Fourth Omnibus Objection to Claims (Duplicate Claims)*, and the  
11 *Reorganized Debtors’ Fifth Omnibus Objection to Claims (Duplicate Claims)*, (collectively, the  
12 “**Omnibus Objections**”),<sup>1</sup> filed contemporaneously herewith.

13 2. In my current position, I am responsible for overseeing the Bankruptcy Case Management  
14 component of AlixPartners’ assignment to assist the Reorganized Debtors with various matters related  
15 to these Chapter 11 Cases. My area of responsibility includes the effort by AlixPartners, in coordination  
16 with the Reorganized Debtors, to review and assess the validity of all claims asserted against the Debtors,  
17 other than (a) Fire Claims and Subrogation Wildfire Claims and (b) providing limited support with  
18 respect to claims for rescission or damages asserted by certain current or former holders of the Debtors’  
19 publicly held debt or equity securities for which the Court set a deferred bar date of April 16, 2020. I  
20 am generally familiar with the Reorganized Debtors’ day-to-day operations, financing arrangements,  
21 business affairs, and books and records. Except as otherwise indicated herein, all facts set forth in this  
22 Declaration are based upon my personal knowledge, the knowledge of other APS professionals working  
23 under and alongside me on this matter, my discussions with the Reorganized Debtors’ personnel, the  
24 Reorganized Debtors’ various other advisors and counsel, and my review of relevant documents and  
25 information prepared by the Reorganized Debtors. If called upon to testify, I would testify competently  
26 to the facts set forth in this Declaration. I am authorized to submit this declaration on behalf of the

27  
28 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Omnibus Objections.

1 Reorganized Debtors.

2 3. The AlixPartners team under my supervision has been actively and intimately involved  
3 in the claims review and reconciliation process since shortly after the filing of these Chapter 11 Cases.  
4 AlixPartners initially assisted the Debtors in the preparation of their bankruptcy schedules based on the  
5 Debtors' books and records. As claims were filed, AlixPartners coordinated with the Debtors the process  
6 of reconciling filed claims with the Debtors' schedules to determine the validity of filed claims based on  
7 those schedules. AlixPartners has developed and maintains a claims reconciliation database and various  
8 data management applications that are used by the Reorganized Debtors and AlixPartners to identify  
9 both valid claims as well as claims that are not valid in whole or in part and the appropriate grounds for  
10 objection to such claims. AlixPartners is now supporting, and will continue to support, the efforts of the  
11 Reorganized Debtors and their counsel to resolve disputed claims, including by formal objections as  
12 necessary.

13 4. As part of the claims review and reconciliation process described above, the AlixPartners  
14 team, working with the Reorganized Debtors' personnel and other professionals, has identified a number  
15 of filed Proofs of Claim that are duplicates of other Proofs of Claim such that, if not disallowed, they  
16 would result in double recovery to the claimants. The Omnibus Objections are directed to some of those  
17 duplicate Proofs of Claim—those specifically identified in Exhibit 1 to each of the Omnibus Objections,  
18 in the column headed "Claims To Be Disallowed And Expunged," and referred to interchangeably in the  
19 Omnibus Objections as either "Duplicate Claims" or "Objected-To Claims." Exhibit 1 to each Omnibus  
20 Objection was prepared by the AlixPartners team under my overall supervision, and I am familiar with  
21 both documents, their contents, and the process under which they were prepared.

22 5. The Objected-To Claims have been identified as duplicates of other claims that are not  
23 being objected to—the Surviving Claims, identified as such in the column bearing the heading  
24 "Surviving Claims" on each Exhibit 1. The duplication arises because either: (a) the Objected-To Claim  
25 was superseded by a subsequently filed Proof of Claim that expresses the intention, either on the face of  
26 or in the attachments to the later-filed Proof of Claim, that the later-filed Proof of Claim is an amendment  
27 to the earlier one (designated on Exhibit 1 to the *Reorganized Debtors' Third Omnibus Objection to*  
28 *Claims (Duplicate Claims)* as "Amended and Replaced Claims"); (b) after the Objected-To Claim was

1 filed, the Surviving Claim was filed against the same Debtor on account of the same asserted obligation,  
2 but the Surviving Claim does not express an intention to amend and supersede the Objected-To Proof of  
3 Claim (designated on **Exhibit 1** to the *Reorganized Debtors' Fourth Omnibus Objection to Claims*  
4 *(Duplicate Claims)* as "Duplicative"; or (c) the Objected-To Claim was filed in the Chapter 11 Case of  
5 the wrong Debtor, while the Surviving Claim was filed in the Chapter 11 Case of the correct Debtor  
6 (designated on **Exhibit 1** to the *Reorganized Debtors' Fifth Omnibus Objection to Claims (Duplicate*  
7 *Claims)* as "Wrong Case").

8 6. The Omnibus Objections do not affect any of the Surviving Claims. There is a single  
9 Surviving Claim for each underlying claim asserted against the Debtors by a Duplicate Claim that is the  
10 subject of the Omnibus Objections.<sup>2</sup> If the Omnibus Objections are sustained and the Duplicate Claims  
11 are disallowed, the Surviving Claims will remain as active claims on the claims register.

12 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
13 correct to the best of my knowledge, information, and belief. Executed this 13th day of August, 2020,  
14 in Dallas, Texas.

15 /s/ Robb McWilliams  
16 Robb McWilliams  
17  
18  
19  
20  
21  
22  
23  
24

25  
26 <sup>2</sup> In some instances the same Surviving Claim appears in multiple entries in the "Surviving Claims"  
27 column on **Exhibit 1**. The multiple entries mean that there were multiple Duplicate Claims filed with  
28 respect to the same underlying obligation, and the identified Surviving Claim listed in multiple entries  
is the sole remaining Proof of Claim for all of the corresponding Objected-To Claims listed in the  
"Claims To Be Disallowed and Expunged" column.